

The American Waterways Operators**Pacific Regional Office**

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March 30, 2000

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Vice President- Pacific Region

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U.S. Army Corps of Engineers, Walla Walla District
Attention: Lower Snake River Study
201 North Third Avenue
Walla Walla, WA 88362-1876

Re: Draft The Lower Snake River
Juvenile Salmon Migration
Feasibility Report/Environment
Impact Statement

Dear Sir/Madam:

These comments are made on behalf of the American Waterways Operators (AWO), the national trade association representing the inland and coastal tugboat, towboat, and barge industry, regarding the Draft Lower Snake River Juvenile Salmon Migration Feasibility Report/Environmental Impact Statement.

AWO wishes to first express its strong support for scientifically sound and balanced recovery measures to reverse the decline of salmon and steelhead in Northwest rivers. AWO opposes any recovery measures that do not address the totality of the salmon/steelhead lifecycle, including habitat, hatchery, hydropower and harvest. AWO has been encouraged by the recent federal AIL-H process which for the first time focuses efforts to examine all areas of salmon decline and not just on the hydropower system.

The inland barge industry on the Columbia-Snake River System is the vital link which connects the Pacific Northwest economy to international trade and commerce. The importance of inland barge transportation on this waterway has been thoroughly documented in the draft feasibility report/EIS as well as in numerous other studies and reports undertaken by the Corps of Engineers. AWO believes the economic impacts of eliminating barge transportation on the lower Snake River have been understated in the FR/EIS. For example, the assumption that railroad rates will remain constant in the absence of competition from barge transportation is ludicrous. It is obvious that any significant interruption of barge transportation on this waterway would have severe adverse economic consequences on farmers and on the region's economic competitiveness. International grain exports as well as containerized cargo from the lower Columbia River will all be seriously affected. Also, the environmental impacts of

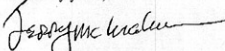
curtailing barge transportation on the lower Snake River have also been understated in the FR/EIS. It is difficult to overstate the negative impacts to the region from the enormous increases in truck and rail transportation in terms of emissions, fuel inefficiency, traffic congestion, and rural road construction, not to mention the alternatives to hydropower energy generation.

The barge industry deplores the fact that the process that is embodied in the FR/EIS has so polarized the proponents of salmon recovery into those favoring breaching the dams and those who are against dam breaching. Breaching the dams is not the issue. Recovering the salmon is the issue that must be decided. There is no scientific basis that dams are the cause of the salmon's decline. If that were the case then the decline of numerous other ESA listed species would not be occurring in other areas of the Pacific Region. There is no single overriding cause of the salmon's decline just as there is no single overriding solution to the salmon's recovery. If there were a single cause, it is one that has received little attention and one over which nobody has much control, and that is the ocean environment, which many scientists believe has had an enormous impact on the salmon's decline.

Based on the foregoing, the American Waterways Operators opposes Alternative 4 Dam Breaching. The report itself is replete with information and statistics that validate the basis for not breaching the dams. First, the report concludes that fish mortality of migrating fish prior to passage of the first dam encountered can often be as high as 95 percent. Second, the report shows that, "overall fish transport survival is 79 to 98 percent, which is considerably higher than the 61 percent in-river survival." Finally, the report concludes that if adverse delayed transport effects in the future are closer to or better than most recent information, then there is little overall statistical advantage to dam breaching relative to NMFS recovery criteria.

Overall, the central conclusion of the report is that the benefits to fish of breaching the four Lower Snake River Dams are highly uncertain and solely dependent on one assumed variable of delayed fish mortality. The harm to the regional economy of this extreme, irreversible salmon recovery measure is certain, and for this reason the barge and towing industry strongly opposes Alternative 4 - Dam Breaching.

Sincerely yours,



Jerry McMahon